

## AFFIDAVIT OF [REDACTED]

I, [REDACTED], being duly sworn, declare under the pains and penalties of perjury, that the following is true and correct to the best of my knowledge and belief. The information provided below about my professional and personal relationship with Dr. Ablow is not intended to be inclusive of every interaction I had with Dr. Ablow, but rather a broad overview.

1. I started seeing Keith Ablow, MD when I was living in New York with my parents in or about the end of 2011 and treated with him until early 2018. I have struggled with depression since I was in high school and I decided to reach out to Dr. Ablow after reading one of his books. I made appointments through his office in Newburyport, MA, although I saw Dr. Ablow in both New York and Massachusetts.
2. At my first appointment with Dr. Ablow, I went to his office in New York. I explained to him that I was depressed and started to explain about my past including how I had been molested by my Rabbi while I was in high school and how, after the molestation I sought treatment for depression at the Meadows in Arizona. I also told him I had gained weight recently. He told me to stand up and twirl around and looked me up and down in a way that made me think he found me attractive. After meeting Dr. Ablow, he insisted that I text him every day, multiple times a day, which I did. It did not take long before I became obsessed with communicating with Dr. Ablow and anxiously awaiting his replies. This was the beginning of my dependency on him.
3. After my first few appointments with Dr. Ablow, he encouraged me to come to Newburyport and explore the idea of Ketamine infusions. I saw other therapists for my depression in the past and did not like the risk of becoming dependent on medication. Despite expressing this to Dr. Ablow, he pushed for me to use medications, including Ketamine. I received a few Ketamine infusions at Seacoast Medical Associates, but did not continue with them since they would only help me temporarily.
4. During one trip to Newburyport, I had Ketamine infusions and Dr. Ablow had his secretary Jaqueline Hodges pick me up and bring me to Dr. Ablow's office for a session. When I arrived at his office for my appointment, he looked at me and said "you are beautiful" and asked me where I was staying. When I told him, he asked why I would ever stay there and picked up the phone and called his friend who owned a hotel. Dr. Ablow said his "friend" needed a room and said "she's beautiful, you want her to come." I did not go to the hotel, but Dr. Ablow also insisted on coming to the apartment where I was staying to "check it out." Dr. Ablow also insisted on paying for my taxi back to the airport in Boston. He also took me to Plum Island since he used to live there and showed me the Blue Inn. I felt like I was getting special treatment from Dr. Ablow.
5. My relationship with Dr. Ablow became sexual fairly quickly. In one of our early conversations Dr. Ablow told me that he wished I had contacted him about help writing a book rather than for therapy so that we could have a sexual relationship. At

one of the early appointments, I met Dr. Ablow at his office in New York. He told me to take off my skirt and my underwear, which I did. He partially pulled down his pants and underwear and he had me perform oral sex on him. He did not allow himself to climax whenever we were intimate including on this occasion. He stopped me before he ejaculated.

6. Early in my treatment Dr. Ablow introduced topics of conversation about my sexual preferences and whether I was into BDSM (bondage, discipline, sadism and masochism). I never understood what this terminology really meant before so he explained it to me. He described it as a sexual preference where one person is dominant and the other is submissive, like a master slave relationship. Prior to meeting Dr. Ablow, my sexual relationships never involved bondage or domination. Dr. Ablow told me that sex gets boring and stale without this power dynamic. He told me many times we were well connected because he was dominant in his sexual preferences and he believed I was submissive. He told me that there were clubs in New York that were for people that liked BDMS and suggested that I go to one and explore this fantasy. At this point I was so eager to please Dr. Ablow, that I took his suggestion. I did not tell him that in reality the whole experience terrified me. I did not want him to think that I didn't enjoy what excited him sexually.
7. From this point forward, we had sexual contact at almost all of our "sessions" in New York as well as Boston. Of course, he charged me for these sessions although he told me he gave me a discounted hourly rate. When I would show up to his office, he would have me take off my clothes, but he would typically leave his on and only partially pull down his pants. One time, he had me massage his back and I saw some of his tattoos. While it was some time ago, I remember one tattoo was of a skull that Dr. Ablow said represented the human breakdown and another was of a snake that represented healing. He would have me perform oral sex and touch his penis with my hands. He would also insert his fingers into my vagina.
8. As early as the first year I started seeing Dr. Ablow, he began to hit me when we engaged in sexual activities. He would have me on my knees and begin to beat me with his hands on my breasts, vagina and buttocks and tell me how lucky I was. On occasion he said words to the effect, "I own you" and "you are my slave". Sometimes he would have me lay on the couch in the room next to his office and beat me with his belt that had a skull belt buckle. He would tell me how he fantasized about tying me up and leaving me bound in his office so he could come back and find me that way. When I would go to his office, he would tell me I needed to be quiet so his secretaries would not hear us. These secretaries included Jaqueline Hodges, [REDACTED] and Amy Dixon.
9. Very soon after meeting Dr. Ablow, he began to talk to me in such a way that made me think we would have a relationship outside of therapy. He called me affectionate names like "baby" and "angel" and told me he loved me. He talked about how he wanted a divorce from his wife, but they were waiting for his son to finish high school. He told me he married the wrong woman and that he should have waited

longer. He explained that his mother was happy when he married his wife because she knew his wife would not complete him so he would forever be attached to his mother.. Sometimes, Dr. Ablow would pose questions in such a way that made me feel like I had to do what he wanted sexually otherwise we couldn't be together. For example, he would ask me if we were in a relationship, would I do everything he told me to do? He also asked me what I thought about having a ten-year relationship and wanted me to write down a list of things that I would and wouldn't allow him to do to me sexually. He explained this was a test to see if I was submissive enough for him.

10. Dr. Ablow also encouraged me to move to Newburyport and offered to help me find housing and a job so we could be closer to each other. My first apartment was less than a mile from Dr. Ablow's office. After moving to Massachusetts, Dr. Ablow would frequently ask me to meet him for "coffee", but I never went.
11. Before I met Dr. Ablow, I did not have any tattoos. However, early in our relationship, he showed me some of his tattoos and introduced the idea of me getting a tattoo of his name or initials near my vagina to show his ownership of me. Within the first year of my treatment with Dr. Ablow, I got a tattoo of his initials on my inner forearm reading "KA II" which was his Facebook name at the time. He also encouraged me to get my clitoris and nipples pierced and also to dye my hair blonde. I also believe this was connected to his sexual fantasies.
12. At some point early in my treatment with Dr. Ablow, I stopped receiving financial support from my parents who had been helping me with my living expenses. When I shared this information with Dr. Ablow and the fact that I was also having trouble paying his fees, he encouraged me to look into escorting and/or stripping since they make a lot of money. He brought up this topic a lot and he made it clear the idea of me doing these activities sexually excited him. He made it seem like this was a good thing for me even though he knew about my history of abuse by my Rabbi and how vulnerable that made me to being taken advantage of by others.
13. Through therapy, Dr. Ablow learned many details of my personal life. Instead of using this information to help me, Dr. Ablow exploited and manipulated me. I grew up in a large conservative Jewish family and he would connect with me that way since he also grew up in a Jewish family. He sent me pictures of his son's bar mitzvah and talked about their trip to Israel. He told me how much he hated his parents and how Jewish parents were the worst and that I needed to get far away from them. He convinced me that isolating myself from my family was the right thing to do and I trusted him so much that I decided to go to law school in Massachusetts to be near him versus a school in New York.
14. When I started law school in 2014, I met my current boyfriend, [REDACTED] On at least one occasion he noticed red marks on my body after an appointment with Dr. Ablow and asked me about them. At that point I was so good at lying about my relationship with Dr. Ablow that I brushed the topic off easily. Dr. Ablow was always



trying to insert himself in my life even with my relationship with [REDACTED] He talked about going into a business with him.

15. In April 2017, [REDACTED] and I wanted to take a trip and Dr. Ablow offered for us to stay at his property at 3 Center Street. During that time, I had a therapy session with Dr. Ablow and he suggested I go in the shed in the back yard with [REDACTED] When we went to the shed, it only contained a bed and I noticed a camera on the beam above the bed. It was clear to me that Dr. Ablow wanted my boyfriend and I to have intercourse so he could watch. After this experience, my treatment with Dr. Ablow began to taper off and I tried to only go to see him when I felt I really needed to.
16. Dr. Ablow was always very careful about how we communicated electronically. He insisted that I delete all my text messages and emails with him. Although I didn't tell him, I would always immediately delete our messages because I was so ashamed and embarrassed of my behavior with him. Dr. Ablow requested I send him naked photographs and occasionally I would send him a shot of an unclothed area of my body. He asked me to download an application called Wickr for encrypted communication, which I did, but I never used it with him.
17. Dr. Ablow was also very open with me about his own medical treatment and drug use. He discussed his old therapist and how he too suffered from depression. He asked me about my drug use and I told him I had started experimenting with cocaine around the time I was molested in high school by my Rabbi and used it occasionally thereafter until recent years. Dr. Ablow said his therapist believed that the use of cocaine had multiple psychiatric benefits, but it wasn't a mainstream treatment. He explained that cocaine use is not a bad thing for psychiatric treatment because it allows you to explore a different side of yourself and encouraged me to continue using it. Dr. Ablow told me he had used it before too and asked me to get cocaine for him, but I never did. He also told me how he wanted to use Ketamine. Sometime in 2017, he began writing me a prescription for Adderall. He offered me prescriptions for opiates which I declined.
18. Since I stopped seeing Dr. Ablow in early 2018, we have occasionally been in contact. I struggled cutting ties with Dr. Ablow because he was so involved in my life for so many years. I grew tired of the emotional abuse that went along with treating with him. Dr. Ablow would punish me if I cancelled appointments by not having any availability in his schedule and seemed to put everything ahead of me despite encouraging me to contact him so frequently. He would frequently change the time of my appointments that were scheduled for the afternoon to the early morning.
19. I have only just begun to understand and appreciate how my many years of "treatment" with Dr. Ablow affected me. I hid the details of what happened between me and Dr. Ablow for years because it is so painful and shameful. I know I need treatment to deal with the many issues caused by his abuse but at this time I cannot afford to pay for that treatment.

Dated: \*

